



### I. BACKGROUND

There is an inconsistency between the California Building Code (Building Code) and the California Fire Code (Fire Code) in as to how covered yard storage of hazardous materials should be treated. In the past, the Department has defined a cover under which hazardous materials are stored as a building. If the quantities of hazardous materials were in excess of the exempt amounts, the cover was designated as a Group H occupancy building or room and thus all requirements related to distance to property lines were applied.

Section 8003.1.20 of the Fire Code, on the other hand, states, "When overhead noncombustible construction is provided for sheltering exterior hazardous materials storage areas, such storage shall not be considered indoor storage when all the following conditions are met":

1. Supports shall be of noncombustible construction.
2. Supports and walls shall not obstruct more than 25% of the perimeter of the storage area.
3. The distance to buildings, property lines, streets, alleys, public ways, or exits to a public way shall not be less than the distance required for an exterior hazardous material storage area without weather protection.

The Fire Code considers outdoor storage to be less hazardous than indoor storage. By isolating storage in an outdoor location, the exposure to the building occupants is much less. In addition, manual firefighting is much safer since firefighters can fight the fire from the exterior of the storage area. The Fire Code also acknowledges that placing a noncombustible cover over the storage does not add to the fire hazard.

Two problems occur with uncovered exterior hazardous material storage. First, the weather can effect the materials themselves. Secondly, any rainwater which is collected within the containment area could be classified as a hazardous waste and be required to be disposed of in an appropriate manner.

### II. POLICY

Effective March 17, 1993 covers erected over outdoor hazardous materials storage and use areas will be considered as "outdoor storage with weather protection." A building permit shall be required. However, Structural Plan Check will enforce only the structural provisions, area limitations, and exiting requirements of the Building Code. Fire Plan Check will

enforce fire protection and requirements related to distance materials storage and all other Fire Code requirements for that storage.

Note: This policy deals with Building and Fire Code requirements only and is not intended to waive Zoning or Planning requirements.

### III. REQUIREMENTS

1. A fire extinguishing system shall be required for all outdoor storage covers greater than 500 square feet which contain flammable and/or combustible hazardous materials. If automatic sprinklers are provided, secondary containment in accordance with Sections 7901.8.4 or 8003.1.7.4 of the Fire Code shall be provided.

Note: When the cover is attached to a building which is equipped with a fire extinguishing system, the cover shall also be protected with a fire extinguishing system in accordance with Chapter 9 of the Building Code. This requirement applies regardless of the size of the attached cover.

2. The size of the storage area shall be limited based on Type II-N construction as specified in Table 5-B 1994 Building Code for the respective occupancy classification.

EXAMPLE:    3,700 sq. Ft. for (H-1 & H-2)  
                     7,500 sq. Ft. for (H-3)  
                     12,000 sq. Ft for (H-7)

Note: This policy is limited to one story outdoor hazardous materials storage areas with weather protection structures. Area increases in accordance with Section 505 of the Building Code are not allowed. To be considered not attached the storage area structure shall be separated from the main building in accordance with Section 503.3, Building Code.

3. The cover must meet structural requirements, including roof live load and stability for wind and seismic forces per Chapter 16 of the Building Code.
4. Supports shall be of noncombustible construction.
5. Supports and walls shall not obstruct more than 25% of the perimeter of the storage area.

6. The distance to buildings, property lines, streets, alleys, public ways, or exits to public ways shall not be less than the distance required for outdoor hazardous materials storage areas without weather protection as specified in the Fire Code. Whenever the Fire Code cross references the Building Code, provisions relating to location and distance to property lines etc., Fire Plan Check staff will be responsible for determining applicable distance requirements.
7. Exits shall comply with Chapter 10 of the Building Code
8. Outdoor storage areas having an area of 200 square feet or more shall be served by at least two separate exits.
9. For outdoor storage areas >200 ft<sup>2</sup> classified as Group H, Divisions 2 and 3, exit doors and gates from outdoor storage areas shall not be provided with a latch or lock unless it is panic hardware.
10. If the outdoor storage area is to be fenced in to provide security, slats or other covering material shall not be installed.
11. Area separation walls will not be required to separate different Types of Construction, regardless of the main building Type of Construction.
12. The area of the outdoor storage area will not be combined with or added to the main building area for area limitations.
13. The outdoor storage area structure can not encroach into a building yard required for area increases to the main building per Section 505 of the Building Code. Any required yards for the main building must extend beyond the outdoor storage area and its structure.

#### IV. PROCEDURES

1. All references to structures complying with this policy should use consistent terminology. Written correspondence between disciplines and customers should refer to "OUTDOOR HAZARDOUS MATERIALS STORAGE WITH WEATHER PROTECTION COVER."
2. The structures must be identified as "OUTDOOR HAZARDOUS MATERIALS STORAGE WITH WEATHER PROTECTION COVER" on the Building Permit and Inspection System (BIPS) screens Y40P1 And Y40SV in the comments fields.
3. A hazardous Materials Questionnaire and/or Hazardous Materials Information sheet shall be submitted at the time of application for a building permit.
4. The plans shall be routed to and reviewed by Fire Department Hazardous (FDHM) prior to review by Structural Plan Check. FDHM will determine when a fire extinguishing system is required and will identify that requirement on the Hazardous Materials Questionnaire and/or the Hazardous Materials Information sheet. The occupancy will also be identified.  
  
EXAMPLE: (H-2) COV
5. On BIPS screen Y40SV the occupancy group shall be identified in parentheses followed by "COV" to distinguish it from other hazardous occupancies.
6. Fire Sprinklers will approve plans for any required fire extinguishing system and Fire Field Inspection will inspect and sign off the inspection record card (IN-1798).